

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

SONYA LARSON,

Plaintiff

V.

DAWN DORLAND PERRY, et al.

Defendants

No.: 1:19-cv-10203-IT

**JOINT REQUEST OF THE PARTIES FOR REVISED
SCHEDULING ORDER DEADLINES**

All of the Parties in the above matter, collectively and jointly request this Honorable Court to order the following Scheduling Order deadlines. In support of this Request, the Parties state as follows:

1. The discovery disputes of Plaintiff (Defendant in Counterclaim), Sonya Larson and Defendant (Plaintiff in Counterclaim) Dawn Dorland Perry were resolved by Magistrate Judge Marianne Bowler and further discovery has been produced by both Parties.
2. The deposition of Sonya Larson has been scheduled for Friday, July 30, 2021.
3. The depositions of Defendants, Cohen Business Law Group, PC and Jeffrey A. Cohen have been scheduled for Thursday, August 19, 2021.
4. The deposition of Dawn Dorland Perry has been scheduled for Friday, September 3, 2021.
5. Given summer schedules of the Parties and legal counsel, the Parties request that the court set the following deadlines for future events as follows:
 - a) Fact discovery of the Parties shall be completed by September 30, 2021.

b) The court schedule a Status Conference at a time convenient to the court on or after September 30, 2021. At the Status Conference that Parties suggest that Mediation before a Magistrate Judge be discussed. If mediation is not agreed to by the Parties or if it is unsuccessful in resolving this Action, the Parties request a further Status Conference to set deadlines for the following:

Plaintiffs' expert disclosures pursuant to Fed. R. Civ. P. 26(a)(2)

Defendants' expert disclosures pursuant to Fed. R. Civ. P. 26(a)(2)

Expert depositions and expert discovery

Dispositive motions

Oppositions to dispositive motions; and

Trial.

WHEREFORE, the Parties respectfully request that this Court amend the Scheduling Order to extend certain deadlines to the dates set forth above.

Respectfully submitted,
Plaintiff,
Sonya Larson,

By her attorneys,
/s/ Andrew D. Epstein
Andrew D. Epstein, BBO No.155140
photolaw@aol.com
Barker, Epstein, & Loscocco
176 Federal Street
Boston, MA 02110
(617) 272-5700

Respectfully Submitted,
Jeffrey A. Cohen and
Cohen Business Law Group, PC

By their attorneys,
/s/ Matthew H. Greene, BBO No. 673947
Boyle | Shaughnessy Law PC
695 Atlantic Avenue
Boston, MA 02111
(617) 451-2000

Respectfully submitted,
Defendant,
Dawn Dorland Perry,

By her attorneys,
/s/Suzanne M. Elovecky
Suzanne M. Elovecky, BBO No. 670047
selovecky@psh.com
Partridge Snow & Hahn
30 Federal Street
Boston, MA 02110
T:617-292-7900

CERTIFICATE OF SERVICE

I certify that the within Joint Request to set scheduling order deadlines was filed through the court's ECF system and a copy was sent electronically on the day it was filed to all counsel of record.

July 6, 2021

/s/ Andrew D. Epstein

Andrew D. Epstein